

NRO

THE ELECTRIC MATERIALS CO.

MANUFACTURERS



ENGINEERS

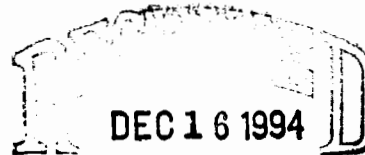
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NORTH EAST, PA 16428
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December 15, 1994

*GEN
PA100507642*

Mr. John R. Crow
Solid Waste Specialist
Bureau of Waste Management
Commonwealth of Pennsylvania
Department of Environmental Resources
1012 Water Street
Meadville PA 16335



DEPARTMENT OF ENVIRONMENTAL
BUREAU OF WASTE MANAGEMENT
1012 WATER STREET
MEADVILLE, PA 16335

Subject: Inspection Report Compliance

Dear Mr. Crow:

The content of this correspondence is to answer the comments of your inspection report of November 2, 1994.

1. Batch neutralization of acid pickling waste water is not classified by Permit by Rule status, will no longer be reported on the annual report.
2. Form 25 R's, sent to Mr. Brian Mummert:
 - Foundry Sand (R101)
 - Wheelabrator Dust (R101)
 - Metal Hydroxide (R101)
 - Cyanide Treatment Waste Water (R403)
 - Draw Lube (R900)
3. Waste storage tanks were checked to ensure that waste were not being stored in improper tanks. Labeling for each tank is correct and the tanks are also labeled as to which tanks are used to store hazardous materials.

THE ELECTRIC MATERIALS CO.

Mr. John R. Crow
Solid Waste Specialist
Bureau of Waste Management
Commonwealth of Pennsylvania
Department of Environmental Resources
Meadville PA 16335
Page 2
December 15, 1994

4. At the present time the hazardous waste storage areas are monitored days by the attendant; second and third shift by plant security. To ensure this, written forms have been developed to document this security. A copy of the form is enclosed.
5. Status Quo.
6. Training of employees handling hazardous waste as stated in the regulations will be followed and a copy of the documentation sheet is enclosed.
7. Accurate reporting of waste volumes and weights will be noted on all Quarterly Reports.
8. The Preparedness, Prevention and Contingency Plan (PPC Plan) has been revised as requested and a copy is enclosed. Also enclosed is a report and corrective actions taken on the cyanide spill incident.

Hopefully, this information sufficiently satisfies the request of the report. If additional information is required, please contact me at 814-725-9621 ext. 297.

Sincerely,

THE ELECTRIC MATERIALS COMPANY



John Wilcox
Safety & Environmental Manager

JW/pc

Encl.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 11-2-94 Time start 9:00 Time finish 12:10
Name of Inspector John Crow
Company, installation name "The" Electric Materials Co.
Location 50 South Washington St. North East, PA 16428
County Erie Municipality North East
Identification number PAD005028642
Name of responsible official Mr John Wilcox
Title Safety Director
Mailing Address 50 South Washington St. North East, PA 16428
Area code and telephone number 814 725-9621
Name of person interviewed Mr. John Wilcox
Title Safety Director
Mailing address (if different from above) above
Area code and telephone number above

1. Current waste handling method:

- a. ☒ On-site ☐ treatment, ☐ storage, ☐ disposal ☒ PBR
b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
c. ☒ Off-site ☒ treatment, ☐ storage, ☒ disposal
d. ☒ Off-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

- a. ~ 92,027 kg./mo. Based on 1992-1994 manifests, quarterly report
b. ~ 1,104,327 kg./yr. and annual PBR reports.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D011	RFE Ind. Inc. Foot of Jersey Ave.	Jersey City, NJ 07303
D002, D006, D008	Environmental Ent. 4650 Spring Grove Rd.	Cincinnati, OH 45232
D001	Chemical Solvents Inc. 7010 Denison Ave.	Cleveland, OH 44103
F002	Ecobtec Inc. 716 N. Irwin St.	Dayton, OH 45404
D001, D035, F003, F005	Marine Shale Processors Inc.	Morgan City La 70389
D040, F001	Chemtron Corp. 3580 Schneider Ct.	Avon OH 44011
F001, D040	Safety-Kleen 3700 Lagrange Rd	New Castle, KY 40050
D002, F007	Cyanstern 12381 Schaefer Highway	Detroit, MI 48227

4. Source Reduction: ☐ accomplished, ☐ proposed, ☒ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name The Electric Materials Co. ID Number PAD005028642 Date 11-2-74

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
✓				Hazardous waste determination, performed on all waste streams	262.11	H001
✓				Identification number	262.12	H002
✓				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
✓				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
✓				PA manifest used for intrastate shipments	262.20(b)	H005
✓				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
✓				Manifests filled out properly and completely	262.20(g)	H007
✓				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
✓				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
✓				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
✓				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
✓				Placards offered to transporter	262.33	H012
✓				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
		✓		Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J <i>SEE Comment # 3</i>	262.34(a)(2)	H014
✓				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
✓				a). All containers of haz. waste in good condition	265.171	H016
✓				b). Containers compatible with hazardous waste being stored within	265.172	H017
✓				c). Containers of hazardous waste kept closed	265.173(a)	H018
✓				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
✓				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
		✓		f). Haz. waste accumulation areas inspected at least weekly <i>SEE Comment # 4</i>	265.174	H021
✓				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
✓				h). Proper containment and collection system(s)	265.178	H023
✓				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
			✗	On the job or classroom personnel training program as per 265.16 <i>SEE Comment # 6</i>	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Records retained at designated location for 20 years	262.40(a)	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Quarterly reports submitted to the Department <i>SEE comment # 7</i>	262.41(a)	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262.42	H028
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste disposal plan, if required	262.45	H029
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262.46(a)	H030
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265 <i>SEE comment # 8</i>	262.46(e)	H031
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262.50, .53, .55, .60	H032
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Source reduction strategy prepared and available <i>SEE comment # 2</i>	262.80	H033

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable	3-Not Determined	4-Non-Compliance
Status					REQUIREMENT	Citation	
1	2	3	4	40 CFR Part 268			
					Generators		
✓					Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
✓					Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
✓					Dilution not used as a substitute for treatment.	3	
✓					Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)	
					Storage Facilities		
	X				Facility verifies generators classification of waste in accordance with waste analysis plan.	25 Pa Code 265.13(c)	
	X				Containers marked to identify contents and accumulation date.	50(a)(2)	
	X				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
	X				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
	X				Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)	
					Treatment Facilities, including PBR and RRR Facilities		
✓					Dilution not used as a substitute for treatment.	3	
✓					Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)	
✓					Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)	
					Land Disposal Facilities		
	X				Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)	
	X				Facility land disposes of restricted waste only if it meets applicable treatment standard.	40	
	X				Facility retains copies of generator notifications and certifications.	7(c)(1)	

COMMONWEALTH OF PENNSYLVANIA
- DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11-2-94 Identification Number PADO05028642
Company/Facility/Site Name The Electric Materials Co.

1. Inspection conducted with Mr. John Wilcox (TEMCO Safety Director) and Mr. Brian Mummert (DER Residual Waste Coordinator). TEMPCO currently generates large volumes of various RCRA wastes and conducts two permit by rule operations on site. Cyanide waste waters are treated on site before being discharged to the North East Borough POTW and stoddard solvent is reclaimed on site in a distillation unit. Until last year TEMCO had batch neutralized an acid pickling waste water under PBR. The facility now operates an automated waste water pretreatment system that continually adjusts the pH of the waste waters. Under the definition section and section 265.1(c)(6) of the regulations the operation of this enclosed system is not considered a PBR activity and TEMCO will not be reporting this waste stream in the annual PBR report.
2. No written source reduction strategies (SRS) were on file for the RCRA waste streams. Please be advised that section 262.80 of the hazardous waste regulations (amended 1-16-93) requires generators to develop a SRS for each type of RCRA waste generated on site. Section 262.80 should be reviewed closely and the required written SRS should be developed by 12-30-94. A copy of the waste reduction plans may be requested by the department after the end of December.
3. Waste stoddard solvent is stored in three of six adjacent above ground storage tanks located within the plant. During the inspection company officials indicated that tank number five contained waste stoddard solvent which is manifested off site as a characteristic hazardous waste. Tank number five was labeled "waste water/coolant". Please be advised that generators that store RCRA waste in tanks are required under section 262.34(a)(2) and 265.194(d) to label the tanks to accurately identify the contents. At a minimum, tank number five should be marked "waste stoddard solvent". It is suggested that tanks #4,5, and 6 also be marked with "hazardous waste" signs.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature] Date
Inspector (signature) [Signature] Date 11-4-94

COMMONWEALTH OF PENNSYLVANIA
- DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11-2-94 Identification Number PAD005028642
Company/Facility/Site Name The Electric Materials Co.

4. Though company officials reported that hazardous waste storage areas and PBR units are routinely inspected, documentation as required by sections 262.40(e), 264.73(5) and 265.195(d) could not be located during the inspection. Please review the appropriate sections of the regulations and begin documenting inspections of RCRA waste accumulation areas and PBR units.

5. Only six drums of hazardous waste were stored on site at the time of the inspection. All containers were labeled, dated and sealed. The accumulation area appeared to have adequate containment capacity.

6. Documentation of the personnel training program as required by sections 262.34(a)(5) and 265.16 was not on file. Please review section 265.16 closely and develop/document an employee training program in accordance with the regulations by December 30, 1994.

7. Manifest PAE1106125 dated 9-22-94 listed fifteen cubic yards of a F002/D008 waste, the quarterly report indicated that the waste was only a F002 waste. Please mark all waste codes in the appropriate boxes on the quarterly report. Manifest PAE1105915 dated 7-28-94 listed 1600 pounds of waste and the quarterly report listed 2400 pounds of waste. Please ensure that the waste volumes/weights listed on the manifests are reported on the quarterly report.

8. The facility preparedness, prevention and contingency (PPC) plan is currently being revised. The department suggests that TEMCO review the sequence of events during the 10-24-94 discharge of untreated cyanide waste waters to the POTW and incorporate preventative measures into the new PPC plan to ensure that future discharges are prevented. After completion, please submit a copy of the revised plan to this office.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____
Inspector (signature)  Date 11-4-94

Change Name, Contact, Add owners Address, Add Waste codes.

RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM
MAINTENANCE FORM FOR EPA NOTIFICATION

EPA-ID# 1P1A1D1010151012181014121 Date: 3-7-94

FACILITY NAME Electric Materials

New Facility Name

Name Change The Electric Materials Co.

Location of Installation

Street _____

City/Town _____ State _____ Zip _____

County Code _____ County Name _____

Installation Mailing Address

Street _____

City/Town _____ State _____ Zip _____

Installation Contact

Last Name Wilcox First John

Job Title Manager Phone # _____

Street _____

City/Town _____ State _____ Zip _____

Ownership

Name of Legal Owner The Electric Materials Co.

Street P.O. Box 390

City/Town North East State PA Zip 16428

Phone # (814) 725-9621 Land Type P Owner Type P

Waste Codes

Delete Old Waste Codes

Add New Waste Codes

D000 D001 D002 F002 D008
F007 D011 D009 U788 D040
F003 F005 D035 _____

Updated in RCRIS by _____

RR

Date 3.17.94

Waste Activity	Type	RCRA Reg. Status	RCRA Reg. Desc.
Generator	_____	_____	_____
TSD	_____	_____	_____
Transporter	_____	_____	_____
Mode of Transportation:			
Air _____	Rail _____	Highway _____	Water _____
Other _____			
Burner/Blender			

B Boiler and/or Industrial Furnace (BIF) only.
 D BIF only; Smelter Deferral.
 E BIF only; Small Quantity Exemption claimed.
 N Not a Burner/Blender, Verified.
 X Other Burner/Blender Activity.
 Blank Unverified.

HWF Market to Burner _____

X Code indicates that the handler is a generator engaged in marketing to burners of hazardous waste fuel activities.
 Blank No activity.

HWF Other Market _____

X Code indicates that the Handler is engaged in hazardous waste fuel marketing activities other than generator marketing to burner.

HWF Burner _____

B Boiler and/or Industrial Furnace.
 X Indication of activity.

OSO Market to Burner _____

X Code indicates that the handler is a generator engaged in marketing to burners of off-spec. used oil fuel.

OSO Other Market _____

X Code indicates that the Handler is engaged in marketing of off-spec. used oil fuel other than generator marketing to burner (e.g., marketing to used oil refinery).

OSO Burner _____

B Boiler and/or Industrial Furnace.
 X Indication of Activity.

SO ACT: _____

Code indicating that the handler is engaged in marketing of specification fuel oil activities.

B Boiler and/or Industrial Furnace.
 X Indication of Activity.

Burner Types

Utility Boiler _____ Industrial Boiler _____ Ind. Furnace _____

Underground Injection Control _____

X Code indicates that the Handler generates and/or treats, stores, or disposes of hazardous waste and has an injection well located at the installation.

Recycler: _____

C Commercial
 R Non-Commercial Recycler
 N Not a Recycler, Verified
 Blank Not a recycler, unverified.

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

RECEIVED
Date Received
FEB 04 1994
OFFICIAL USE ONLY
SECTION

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒B. Subsequent Notification
(complete item C)☐☐☐☐☐☐☐☐☐☐☐☐☐☐☐

C. Installation's EPA ID Number

II. Name of Installation (Include company and specific site name)

T h e E l e c t r i c M a t e r i a l s C o .

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

5 0 S o u t h W a s h i n g t o n S t r e e t

Street (continued)

City or Town

N o r t h E a s t

State

P A

ZIP Code

1 6 4 2 8 -

County Code

County Name

E r i e

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

P O B o x 3 9 0

City or Town

N o r t h E a s t

State

P A

ZIP Code

1 6 4 2 8 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

W i l c o x

(first)

J o h n

Job Title

M a n a g e r

Phone Number (area code and number)

8 1 4 - 7 2 5 - 9 6 2 1

VI. Installation Contact Address (See Instructions)

A. Contact Address

Location

Mailing

☒☒

B. Street or P.O. Box

NA

City or Town

State

ZIP Code

-

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

T H E E l e c t r i c M a t e r i a l s C o .

Street, P.O. Box, or Route Number

P O B o x 3 9 0

City or Town

N o r t h E a s t

State

P A

ZIP Code

1 6 4 2 8 -

Phone Number (area code and number)

8 1 4 - 7 2 5 - 9 6 2 1

B. Land Type

☐

C. Owner Type

☐

D. Change of Owner Indicator

☐☒(Date Changed)
Month Day Year

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

1. Generator (See instructions)
☒ a. Greater than 1000kg/mo (2,200 lbs.)
☐ b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
☐ a. For own waste only
☐ b. For commercial purposes
- Mode of Transportation
☐ 1. Air
☐ 2. Rail
☐ 3. Highway
☐ 4. Water
☐ 5. Other - specify _____
- ☒ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☐ c. Boiler and/or Industrial Furnace
- Indicate Type of Combustion Device(s)
☐ 1. Smelter Refractor
☐ 2. Small Quantity Exemption
☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace
- ☐ 5. Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☐ c. Burner - Indicate device(s) - Type of Combustion Device
☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace
- ☐ 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒ 2. Corrosive (D002) ☒ 3. Reactive (D003) ☐ 4. Toxicity Characteristic (D000) ☒
- (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
F 0 0 2

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1 F 0 0 2	2 D 0 0 8	3 F 0 0 7	4 D 0 1 1	5 D 0 0 9	6 U 1 8 8
7 D 0 0 2	8 D 0 4 0	9 F 0 0 3	10 F 0 0 5	11 D 0 3 5	12 D 0 0 1

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number. See instructions.)

1 F 0 0 1	2	3	4	5	6
--------------	---	---	---	---	---

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature



Name and Official Title (type or print)

James L. Johnson, V.P. - Gen. Mgr.

Date Signed

1/24/94

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

THE ELECTRIC MATERIALS CO.

MANUFACTURERS



ENGINEERS

BOX 390
NORTH EAST, PA 16428
(814) 725-9621

Toll Free Number (800) 356-2211
Telex 387783
Fax (814) 725-3620

RECEIVED
FEB 11 1994
EPA REGION

February 9, 1994

U.S. E.P.A. Region III
RCRA Programs Branch
Pennsylvania Section (3HW51)
841 Chestnut Building
Philadelphia PA 19107

Subject: EPA Form 8700-12 and 1993 Hazardous Waste Report

To Whom It May Concern:

Enclosed is the EPA Form 8700-12, corrected, and the 1993 Hazardous Waste Report.

As per our phone conversation, Section II, the correct name of the installation is The Electric Materials Company. Section VIIA, name of installation's legal owner is The Electric Materials Company. Section IX, description of regulated waste, contains the list of current wastes.

If there are any questions regarding either of these reports, please contact me at 814-725-9621, extension 297.

Sincerely,

THE ELECTRIC MATERIALS COMPANY

John Wilcox
Safety and Environmental Manager

JW/pc



Please refer to the *Instructions to Filing Notification* before completing this form. The information requested here is required by law, (S. 3010 of the Resource Conservation and Recovery Act).

Comments

[illegible]

T	H	E	E	L	E	C	T	R	I	C	M	A	T	E	R	I	A	L	S	C	R	O	M	P	A	N	Y
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

Street or P.O. Box

[illegible]**Street or Route Number**

C	5	0		S	O	U	T	H		W	A	S	H	I	N	G	T	O	N		S	T	R	E	E	T	
	City or Town																				State		ZIP Code				
C	N	O	R	T	H		E	A	S	T																	
6																					P	A	1	6	4	2	8

Name and Title (last, first, and job title)

[illegible]

A. Name of Installation's Legal Owner

[illegible]

A. Hazardous Waste Activity

☒ 1a. Generator ☐ 1b. Less than 1,000 kg/mo.

☐ 2. Transporter

☐ 3. Treater/Storer/Disposer

☐ 4. Underground Injection

☐ 5. Market or Burn Hazardous Waste Fuel
(enter "X" and mark appropriate boxes below)

☐ a. Generator Marketing to Burner

☐ b. Other Marketer

☐ c. Burner

B. Used Oil Fuel Activities

☐ 6. Off-Specification Used Oil Fuel NA
(enter 'X' and mark appropriate boxes below)

☐ a. Generator Marketing to Burner

☐ b. Other Marketer

☐ c. Burner

☐ 7. Specification Used Oil Fuel Marketer (or On site Burner)
Who First Claims the Oil Meets the Specification NA

NA ☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. Industrial Furnace☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify) NA

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☐ A. First Notification ☒ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number											
P	A	D	0	0	5	0	2	8	6	4	2

C

W

T/A C

1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1	2 F 0 0 6	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary. NA

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary. NA

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary. NA

49	50	51	52	53	54
----	----	----	----	----	----

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☐ 1. Ignitable
(D001)

☒ 2. Corrosive
(D002)

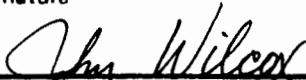
☐ 3. Reactive
(D003)

☒ 4. Toxic
(D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature



Name and Official Title (type or print)

John Wilcox, Safety Director

Date Signed

7/22/91

Gen

Hazardous Waste Inspection Report
Generators - Part A

Date of inspection 9-13-90 Time start 09:30 Time finish 15:15
 Name of inspector Richard E. Strawn
 Company, installation name The Electric Materials Co.
 Location 50 South Washington St., North East PA 16428
 County Erie Municipality North East
 Identification number PAD 005028642
 Name of responsible official John Wilcox
 Title Safety Director
 Mailing address 50 South Washington St., North East, PA 16428
 Area code and telephone number 814-725-9621
 Name of person interviewed John Wilcox and Pat Gallagher
 Title Safety Director and Mgr-Plant Engineer
 Mailing address (if different from above) above
 Area code and telephone number above

1. Current waste handling method:

- a. ☒ On-site ☐ treatment, ☐ storage, ☐ disposal ☒ PBR
 b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
 c. ☒ Off-site ☒ treatment, ☐ storage, ☒ disposal
 d. ☒ Off-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

a. > 44,658 kg./mo.
 b. > 535,900 kg./yr.

{Based on Manifested
 shipments and the Annual
 Report (PBR) for 1989.
 See Comments

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F001	Safety-Kleen, Hebron, OH	Reclaim (TCE)
F006	Unknown - suspected shipped as D002	
F007	Treated under PBR	
D001	Safety-Kleen, Hebron OH	Reclaim (Stoddard Solvent)
D001	Safety-Kleen, New Castle, KY	Reclaim (Stoddard Solvent)
D001	Safety-Kleen, Linden, N.J.	Incinerate (HOC > 1000 ppm)
D002, D008	Frontier Chemical, Niagara Falls	Treatment (wwTP)
D002	Frontier Chemical - possibly on F006	

Hazardous Waste Inspection Report
Generators - Part B

PAD 005 028 642

9-13-90

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non Compliance	
Status				REQUIREMENT			Chapter Citation
1	2	3	4				75.262
		✓		Hazardous waste determination, copies available <i>See Comment #2</i>			(b)
✓				Identification number			(c)(1)
✓				Hazardous waste shipments offered only to licensed transporters			(c)(4)
	✓			Authorization received from TSD facility for wastes shipped off-site			(d)
	✓			PA manifest used for intrastate shipments			(e)(2)
✓				Disposer state manifest or EPA manifest used for out-of-state shipments			(e)(3)
✓				Manifests filled out properly and completely			(e)(7)
		✓		Manifests routed properly and within time limits (7 days)			(e)(14) or (15)
✓				Proper U.S. DOT shipping containers or packages			(f)(1)(i)
✓				Shipping containers marked and labeled according to U.S. DOT			(f)(1)(ii)
✓				Containers of 110 gal. or less marked with required PA label			(f)(1)(iii)
		✓		Placards offered to transporter			(f)(2)
✓				Wastes accumulated on-site for less than 90 days			(g)(1)(i)
			✗	Wastes stored in proper containers and properly marked and labeled			(g)(1)(ii)
			✗	Containers managed in accordance with 75.265(q)(1)-(14) <i>see Comment #4</i>			(g)(1)(iii)
✓				Containers clearly marked with accumulation date and visible for inspection			(g)(1)(iv)
✓				Records retained at designated location for 20 years			(h)
✓				Quarterly reports submitted to the Department			(i)
✓				Exception reporting procedures followed			(j)
	✓			Hazardous waste disposal plan, if required			(l)
		✓		Spill reporting procedures followed			(m)(1)
✓				Preparedness, Prevention and Contingency Plan and implemented			(m)(5)
		✓		Special requirements followed for international shipments <i>See Comment #2</i>			(o)
			✗	On the job or classroom personnel training program [75.265(f)] <i>see Comment #5</i>			(g)(1)(6)
✓				Drum accumulation area inspected weekly as per 75.265(q)(5)			(g)(1)(iii)
		✓	✗	<i>Special requirements for reclaiming haz waste</i> <i>see Comment #7</i>			261.6 (b)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 9-13-90 Identification Number PAD 005 028 642
Company, Installation Name The Electric Materials Co. (TEMCO)
County Erie Municipality North East

1. The Electric Materials Co. (TEMCO) should maintain proper records of the volumes of standard solvent reclaimed on-site in the still. These volumes should be shown on the Quarterly Reports. The volumes shown on page #1 of this report do not include what TEMCO has reclaimed on site.
2. Two separate waste streams are being treated under PBR: (a) In one operation an acid waste from a pickling / quenching operation is neutralized with NaOH in a 1,500 gallon tank as a batch operation. The sludge generated from this process is run through a filter press and said to be sent to Noranda (??) in Montreal, Canada to recover metals (copper). By Oct 12, 1990 TEMCO should supply this office with a complete analysis ~~of the filter cake~~ and documentation (receipts) showing where it has been sent recently. (b) In a second operation cyanide bearing waste waters from at least four separate electroplating operations are batch treated in a 1,000 gallon tank.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Mailed Certified Date 9-20-90
Inspector (signature) Richard E. Strawn Date 9-14-90

**Hazardous Waste Inspection Report
Comments - Part C**

Date of Inspection 9-13-90 Identification Number PAD 005028642
Company, Installation Name The Electric Materials Co (TEMCO)
County Erie Municipality North East

- During the inspection, it was explained that the sludge (F006) from this operation was drained off and placed into 55 gallon drums for disposal. A review of the Quarterly Reports and the manifests for the past two years has not shown any F006 ever having been shipped from this facility. A statement on the Quarterly Reports indicate that this sludge has been sent to a metal reclaimer. By Oct 12, 1990 TEMCO should supply this office with full documentation (including an analysis) ~~to verify~~ to verify that this sludge has commercial re-sale value and where it has been sent.
3. Prior to treatment, the cyanide bearing waste waters are stored in a 2,500 gallon underground tank. A remote reading tank level gage for this tank did not appear to be accurate. This gage should be repaired or replaced immediately.
4. A shipment of hazardous waste was made on Sept 6, 1990. Only one drum of F001 (TCE) was ready for disposal and one drum of D001 (stoddard solvent) was partially full by the still.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Mailed Certified Date 9-20-90
Inspector (signature) Richard E. Strawn Date 9-14-90

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 9-13-90 Identification Number PAD 005028642
Company, Installation Name The Electric Materials Co (TEMCO)
County Erie Municipality North East

- This drum was being used to accumulate waste from the still and would be used to transport the waste from the still to a 550 gallon waste standard solvent holding tank. This drum should be kept closed and identified as containing waste standard solvent.
5. A complete training program should be developed by Oct 12, 1990 and all required records should be maintained.
6. This facility used to generate two wheelabrator dusts. One is non-hazardous and is sent to Lake View Landfill. The other was hazardous for Pb and Cd. According to Mr. Wilcox, TEMCO changed alloys two years ago and have not generated any hazardous wheelabrator dust since. Every drum is now tested and if the Cu content is greater than 10% the dust is mixed with oil and sent to Noranda (??) for Cu recovery. By Oct 12, 1990 TEMCO should supply this office with documentation to verify the above.
7. If the F006 is being legitimately reclaimed (for

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Person Interviewed (signature) Mailed Certified Date 9-20-90
Inspector (signature) Richard E. Shuman Date 9-14-90

**Hazardous Waste Inspection Report
Comments - Part C**

Date of Inspection 9-13-90 Identification Number PAD 005 028 642
Company, Installation Name The Electric Materials Co. (TEMCO)
County Erie Municipality North East

metals.) TEMCO is still responsible for handling this waste as a hazardous waste under Section 261.6 (b). It appears at this time that TEMCO is in violation of either making an improper determination of the F006 sludge and shipped it as a D002 waste or did not manifest it and did not report the quantities generated at all and mixed it with the pickling sludges.

8. It is recommended that future analysis be done using the TCLP (toxicity characteristic leaching procedure) which is required under Federal law.

9. Please be advised that effective Feb 10, 1990 the Pa. Hazardous Waste Regulations were re-numbered.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Mailed Certified Date 9-20-90
Inspector (signature) Richard E. Shrawn Date 9-12-90

Inspector: Richard Strawn
 Address: 1012 Water St
Mendville PA 16335
 Telephone No: 814-332-6848

**RCRA LAND DISPOSAL RESTRICTION
 GENERATOR CHECKLIST**

I. HANDLER IDENTIFICATION

The Electric Materials Co 50 South Washington St.
 A. Handler Name B. Street (or other identifier)
North East PA 16428 Erie
 C. City D. State E. Zip Code F. County Name
Foundry, Forging, Machining, Plating (Al, Sn, Al, Ni, and Cd)
 G. Nature of Business; Identification of Operations: SIC Code(s)
PAD 005 028 642
 H. EPA ID #
Mr John Wilcox, Safety Director 814-725-9621
 I. Handler Contact (Name and Phone Number)

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

- a. Does the handler generate the following wastes? F001, F002, F004, or F005 Yes No D001, D002, D006, D008 wastes
 (1) F001, F002, F004, or F005
 (11) F003 Yes No No LDR

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? documentation was available for any
Yes No wastes.

- b. Source of the above: Form 8700-12 _____; Part A _____; Part B _____; Biennial/Annual Reports _____ Facility generates in excess of 1,000,000 lbs per year.
 other (specify) _____

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that

(1)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection - *THE ELECTRIC MATERIALS CO.*
PAD 00 502 8642

DATE: *SEPT. 23, 1987*

FROM: William L. Walsh, EPS
PA RCRA Enforcement Section (3HW11) *WLW*

TO: File

Peter W. Schaul, Chief
PA RCRA Enforcement Section (3HW11)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS REQUIRED
AT THIS TIME.

EPA

HAZARDOUS WASTE INSPECTION REPORT
Generator - Part A

Follow-up

Date of inspection 8-19-87 Time start 10:00 Time finish 12:00
 Name of inspector Richard E. Strawn
 Company, installation name The Electric Materials Co.
 Location 50 South Washington St North East PA 16428
 County Erie Municipality North East
 Identification number PAD 005028642
 Name of responsible official John Wilcox
 Title Safety Director
 Mailing address 50 South Washington St. North East PA 16428
 Area code and phone no. 814-725-9621
 Name of person interviewed John Wilcox
 Title Safety Director
 Mailing address (if different from above) Above
 Area code and phone no. Above

1. Current waste handling method:

Follow-up

- a. ☒ On-site ☒ treatment, ☐ storage, ☐ disposal P-B-R
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

Two 1000 gallon Batches treated since

Last inspection of 6-17-87 plus

Amount indicated on last inspection

a. 6498 (Approximately) kg. mo.b. kg. yr. Report.

3. Types of hazardous waste produced by Hazardous Waste Number:

F001, F006, F007 D002 D006 D0084. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

7.3 lb. per gal. x 1000. gallons = 7333 lbs ÷ by 2.2 = 3333 Kg.
3165 Kg
6498

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part B

1- NON COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	REFERENCE
1	2	3	4		
	✓			Identification number	(c) (1)
	✓			Hazardous waste shipments offered only to licensed transporters	(c) (4)
	✓			Authorization received from TSD facility for wastes shipped off-site	(d)
		✓		PA manifest used for intrastate shipments	(e) (2)
	✓			Disposer state manifest or EPA format manifest used for out-of-state shipments	(e) (3)
	✓			Manifests filled out properly and completely	(e) (7)
	✓			Manifests routed properly and within time limits (24 hours)	(e)
	✓			Proper U.S. DOT shipping containers or packages	(f) (1)
	✓			Shipping containers marked and labeled according to U.S. DOT	(f) (1) (2)
X				Containers of 100 gal. or less marked with required PA label <i>See Comment #4</i>	(f) (1) (3)
		✓		Placards offered to transporter	(f) (2)
	✓			Wastes accumulated on-site for less than 90 days	(g) (1)
X				Wastes stored in proper containers and properly marked and labeled <i>See Comment #4</i>	(g) (1) (2)
	✓			Containers managed in accordance with 75.265(q) (1-9)	(g) (1) (3)
X				Containers clearly marked with accumulation date and visible for inspection <i>See Comment #4</i>	(g) (1) (4)
	✓			Records retained at designated location for 20 years.	(h)
	✓			Quarterly reports submitted to the Department	(i)
		✓		Exception reporting procedures followed	(j)
		✓		Hazardous waste disposal plan, if required	(l)
		✓		Spill reporting procedures followed	(m) (1)
	✓			Preparedness, Prevention and Contingency Plan approved and implemented <i>See Comment #7</i>	(m) (5)
		✓		Special requirements followed for international shipments	(o)
	✓			ON THE JOB OR CLASSROOM PERSONNEL TRAINING PROGRAM AS PER 75.265 (F).	9(1)(v)

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

Date of inspection 8-19-87 Identification number PAD 005 028642

Company, Installation name The Electric Materials Co.

County Eric Municipality North East

1. This follow-up inspection was conducted to check facility for compliance with all applicable requirements of Permit-By-Rule status and to insure that the violations mentioned in a Notice of Violation dated July 1, 1987 had been abated.
2. Proper Pa. Hazardous waste labels had been acquired.
3. A shipment of hazardous waste was made on Aug 10, 1987. There was no hazardous waste being stored on site at the time of the inspection except a partially full container of wheelabrator dust which was being filled at the point of generation.
4. A plastic hood was being used as a connector between the sheet and the receiving container at the point where the hazardous wheelabrator dust was being generated. This container did not have a hazardous waste label on it nor did it have an accumulation date on it. This container should be properly labeled and the

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Person Interviewed (signature) _____

Date _____

Inspector (signature) _____

Richard E. Starn

Date _____

8-20-87

HAZARDOUS WASTE INSPECTION REPORT

Part C - Comments

Date of inspection 8-19-87 Identification number PAD005028642Company, Installation name The Electric Materials CoCounty Erie Municipality North East

accumulation date is the first date any hazardous waste is placed in the container.

5. Records are now being maintained which would reflect the quantities of the wastewaters from the electroplating operations which contain cyanide that are being batch treated in a 1000 gallon batch treatment tank. It was recommended that these quantities be reported on the Quarterly Reports as well as on the Annual Report.

6. An analysis of the rinse waters from the Old Plating Room which are being discharged directly to the POTW ^{was} ~~are~~ requested during the inspection. An analysis of these waters should be sent to this office within fifteen (15) days of the receipt of this report. Mr. Wilson stated that the analysis was available but requested some time to locate it.

7. Since this facility has undergone several changes since the PPC Plan was made in

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Person Interviewed (signature)

Date

Inspector (signature)

Richard E. Strawn

Date

8-20-87

Date of inspection 8-19-87 Identification number PAD005028642

Company, Installation name The Electric Materials Co.

County Erie Municipality North East

November 1984, it was agreed during the inspection that a new PPC Plan would be made reflecting all the changes and be submitted to this office by Nov 2, 1987. Particular attention should be paid to how the wastewaters from the electroplating operations which contain cyanide are handled from their point of origination to their final disposition. An effective PPC Plan is required under 25.265 (2)(17).

8. The pit / sump located under under the cyanide tanks was being used as a containment tank. This practice should cease. The overflow wastewaters which enter this pit / sump should be immediately pumped out, thus allowing this pit / sump to function as an emergency ~~containment~~ containment for the above tanks.

9. The wastewaters from the above mentioned sump are being pumped to a 2500 gallon ^{under} ~~under~~ floor sump tank where they are held before being pumped

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____

Date _____

Inspector (signature) _____

Richard E. Strawn

Date _____

8-20-87

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

Date of inspection 8-19-87 Identification number PA D 005028642
Company, Installation name The Electric Materials Co.
County Erie Municipality North East

into a 1000 gallon batch treatment tank. Since there is always a certain inherent danger associated with underground tanks it is recommended that The Electric Materials Co. explore other options concerning the storage of these wastes. By ~~storing~~ using this tank the Electric Materials Co. may have other responsibilities under the LUST (Leaking Underground Storage Tank) requirements. For information concerning this program contact:

MR. Foster Diodata
Pa. Dept. of Enviro. Resources
Bureau of Water Quality
P.O. Box 2063
Fulton Bank Bldg.
Harrisburg, PA 17120
717-447-8184

Until another method is employed to ~~store~~ store these wastewaters, some method should be employed

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____
Inspector (signature) Richard E. Hawn Date 8-24-87

HAZARDOUS WASTE INSPECTION REPORT

Part C - Comments

Date of inspection 8-19-87 Identification number PAD 005028642Company, Installation name The Electric Materials CoCounty Erie Municipality North East

which would make it possible to accurately determine the volume of wastewater which is present in this tank at any given time. This should be accomplished by Nov. 2, 1987 as agreed to during the inspection.

Also, please document in writing and submit to the Department within fifteen (15) days of the receipt of this letter all available information concerning this 2500 gallon tank. Please include such information as actual dimensions, construction material, lining material (and thickness) and age.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____

Date _____

Inspector (signature) Richard E. HixonDate 8-24-87

(F)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection - *THE ELECTRIC MATERIALS Co.*
PAD 00 502 8642

DATE: *July 27, 1987*

FROM: William L. Walsh, EPS
PA RCRA Enforcement Section (3HW11) *WLV*

TO: File
19
Peter W. Schaul, Chief
PA RCRA Enforcement Section (3HW11)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF
THESE VIOLATIONS.

waste mislabeling on Fuertes

EPA

bc: EPA ✓
Central Office
Meadville Regional Office
Erie County File
John Mead
Chron.

1012 Water Street
Meadville, Pennsylvania 16335
Telephone: A. C. 814/724-8526
July 1, 1987

CERTIFIED MAIL #P-547 805 048

Subject: Hazardous Waste Inspection
The Electric Materials Company
ID #PAD005028642

NOTICE OF VIOLATION

Mr. John Wilcox, Safety Director
The Electric Materials Company
50 South Washington Street
North East, Pennsylvania 16428

Dear Mr. Wilcox:

This Notice of Violation is being sent to you pursuant to the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. 6018.101 et seq. The requirements of this Act are being enforced by the Pennsylvania Department of Environmental Resources which is responsible for the regulating and managing of solid waste, including hazardous waste, within the Commonwealth of Pennsylvania. Your facility is in violation of the above mentioned Solid Waste Management Act and of the Chapter 75 Hazardous Waste Regulations adopted on September 14, 1985 (25 Pa. Code 75.1 et seq.).

Department personnel performed a hazardous waste generator inspection of The Electric Materials Company's facility located at 50 South Washington Street, North East, Pennsylvania on June 17, 1987. This inspection revealed the following violations:

1. Wastewater from the cadmium, silver and copper electroplating operations which contain cyanide wastes are discharged to a 2,500 gallon underfloor sump tank. The accumulated wastewater is then pumped into a 1,000 gallon treatment tank for batch treatment. Records were not available which would indicate the quantities of hazardous waste generated during the electroplating process and treated under Permit-by-Rule status. This is unlawful conduct as defined by Section 403(b) which states:

"It shall be unlawful for any person or municipality who generates, transports, stores, treats or disposes of hazardous waste to fail to maintain such records as are necessary to accurately identify the quantities of hazardous waste generated, the constituents thereof which are significant in quantity or in potential harm to human health or the environment, the method of transportation and disposition of such waste; and where applicable, the source and delivery points of such hazardous waste."

July 1, 1987

2. Six (6) containers of hazardous waste were labeled as hazardous waste but proper Pennsylvania hazardous waste labels were not being used as required by Section 75.262(f)(1)(iii).
3. One (1) container of hazardous waste labeled as wheelabrator dust had been stored in excess of ninety (90) days in violation of Section 75.262(g)(1)(i).
4. One (1) container of hazardous waste (wheelabrator dust) was not closed in violation of Section 75.265(q)(3) which generators are referred to by Section 75.262(g)(1)(iii).

In order to abate the above mentioned violations, The Electric Materials Company should:

1. Conform to Section 264(k) which requires that an operating record be maintained at the facility which would reflect the quantities of hazardous waste generated and treated.
2. Obtain and use proper Pennsylvania hazardous waste labels.
3. Ensure that all hazardous waste is either treated or shipped within ninety (90) days.
4. Ensure that all containers holding hazardous waste are kept closed during storage, except when it is necessary to add or remove waste.

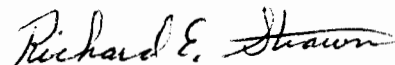
Please be advised that the Solid Waste Management Act provides for separate penalties for violations of each of its sections on separate days.

This Notice does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of its law arising prior to or after the issuance of this Notice or the conditions upon which this Notice is based.

This Notice shall not be construed so as to waive or impair any rights of the Department of Environmental Resources heretofore or hereafter existing. This Notice shall also not be construed as a final action of the Department of Environmental Resources.

Should you have any questions regarding this Notice, please feel free to contact me at this office.

Sincerely,



Richard E. Strawn
Solid Waste Specialist
Bureau of Waste Management

RES/skg

HAZARDOUS WASTE INSPECTION REPORT
Generator - Part A

1 of 5
EPA

Date of inspection 6-17-87 Time start 10:15 Time finish 2:30
Name of inspector Richard Strauss, Ricardo Gilson
Company, installation name The Electric Materials Co.
Location 50 South Washington St. North East PA 16428
County Erie Municipality North East
Identification number PAD 005 028 642
Name of responsible official John Wilcox
Title Safety Director
Mailing address 50 South Washington St, North East PA 16428
Area code and phone no. 814-725-9621
Name of person interviewed John Wilcox
Title Safety Director
Mailing address (if different from above) Above
Area code and phone no. Above

1. Current waste handling method: Permit - by - Rule

- a. ☒ On-site ☒ treatment, ☐ storage, ☐ disposal
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 3165 kg./mo. Based upon last inspection Report.
b. kg./yr. Not determined how much waste water is being treated.

3. Types of hazardous waste produced by Hazardous Waste Number:

F001, F006, F007, D002, D006, D008

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part 1

2 of 5

C. RCRA 265 (f) (1) - 265 (f) (9)				HAZARDOUS WASTE INSPECTION REPORT	DATE
REQUIREMENTS					
1	2	3	4		
	✓			Identification number	(c)
	✓			Hazardous waste shipments offered only to licensed transporters	(c) (6)
	✓			Authorization received from TSD facility for wastes shipped off-site	(d)
		✓		HA manifest used for intrastate shipments	(c) (1)
	✓			Disposer state manifest or EPA format manifest used for out-of-state shipments	(c) (1)
	✓			Manifests filled out properly and completely	(c) (7)
	✓			Manifests routed properly and within time limits (24 hours)	(c)
	✓			Proper U.S. DOT shipping containers or packages	(f) (1)
	✓			Shipping containers marked and labeled according to U.S. DOT	(f) (1)
X				Containers of 100 gal. or less marked with required PA label	(f) (1)
		✓		Placards offered to transporter	(f) (1)
X				Wastes accumulated on-site for less than 90 days	(g) (1)
X				Wastes stored in proper containers and properly marked and labeled	(g) (1)
X				Containers managed in accordance with 75.265 (q) (1-9)	(g) (1)
	✓			Containers clearly marked with accumulation date and visible for inspection	(g) (1)
	✓			Records retained at designated location for 20 years	(h)
	✓			Quarterly reports submitted to the Department	(i)
		✓		Exception reporting procedures followed	(j)
		✓		Hazardous waste disposal plan, if required	(l)
		✓		Spill reporting procedures followed	(m) (1)
	✓			Preparedness, Prevention and Contingency Plan approved and implemented	(m) (5)
		✓		Special requirements followed for international shipments	(o)
	✓			ON THE JOB OR CLASSROOM PERSONNEL TRAINING PROGRAM AS PER 75.265 (f).	g(1)(

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

3 of 5

Date of inspection 6-19-82 Identification number PA11005025642

Company, Installation name The Electric Materials Co.

County Erie Municipality North East

1. The Electric Materials Company has notified that they are treating hazardous waste at their facility under Permit-by-Rule status. This inspection was to confirm compliance with the Permit-by-Rule requirements. This facility needs to develop and follow a written inspection schedule as required in Section 25.264(e)(2). This facility had treated wastewater from electroplating operations which contained cyanide. A record of the quantities of cyanide wastewater treated was not available. A record of the quantities of hazardous waste treated are to be maintained in accordance with Section 25.264(k). All other required records were being maintained. Annual report forms will be sent by the Department.
2. During the inspection it was observed that a small quantity of non-hazardous wheelabrator dust had been dumped onto a pile of foundry sand.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____

Inspector (signature) Richard E. Strawn Date 6-19-82

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

4 of 5

Date of inspection 6-17-87 Identification number POP C05C25642
Company, Installation name The Electric Materials Co
County Erie Municipality North East

The amount of wheelabrator dust would amount to approximately fifty five gallons. An annual analysis of the foundry sand was to have been submitted to this office by May 19, 1987 as a condition of the Module I approval at Lakeview Landfill. As of the date of this report no analysis has been received at this office. In addition please be advised that the wheelabrator dust (non-hazardous) is presently going through the Module I review process to be disposed of at Lakeview Landfill but as of this date has not been approved; therefore since the non-hazardous wheelabrator dust and the foundry sand have been mixed together some of the material from this pile should be disposed of at Lakeview Landfill until both of these wastes have been approved and have satisfied all conditions.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____
Inspector (signature) Richard E. Stinson Date 2-19-87

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

5 of 5

Date of inspection 6-19-82 Identification number PAD005028642

Company, Installation name The Electric Materials Co

County Erie Municipality North East

of that approval.

3. Six containers of hazardous waste were not labeled with the proper R. hazardous waste label. The Electric Materials Company should acquire proper R. hazardous waste labels which meet the requirements set forth in Section 25.262(g)(1)(iii).

4. One container of wheelabrator dust (D008) had been stored in excess of ninety days in violation of Section 25.262(g)(1)(i).

5. One container of hazardous waste (wheelabrator dust) was not closed in violation of Section 25.265(g)(3) which generators are referred to by Section 25.262(g)(1)(iii).

6. Manifests and Quarterly Reports for 1986 and first quarter of 1987 were checked during the inspection.

7. A follow-up inspection will be conducted in the near future.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____

Inspector (signature) Richard E. Starn Date 6-19-82

Hazardous Waste Quantity Notification

Business Name The Electric Materials Co
Business Address 50 South Washington St.
North East, Pa. 16428
EPA ID Number PAD 00 502 8642

Hazardous Waste Generated

0 - 100 kg/month ☐

100 - 1000 kg/month ☒

1000 kg/month or more ☐

John Wiley Safety Director
Signature and Title AND Hazardous
Waste manager



Official Business
Penalty for Private Use
\$300

FIRST-CLASS MAIL
POSTAGE & FEES PAID
EPA
PERMIT NO. G-35

United States
Environmental Protection
Agency

Washington DC 20460

JOHN A ARMSTEAD
VA/WV SECTION (3HW31)
US EPA REGIONIII
841 CHESTNUT ST.
PHILADELPHIA, PA 19107

EPA Form 5180-11 (5-79)

BUREAU OF SOLID WASTE MANAGEMENT
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NUMBER

PAD005028642

NAME OF INSTALLATION

The Electric Materials Company

II INSTALLATION MAILING ADDRESS

STREET OR P. O. BOX

P O Box 390

CITY OR TOWN

North East

ST.

ZIP CODE

PA

16428

IV LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

50 South Washington Street

MUNICIPALITY

North East

CITY OR TOWN

North East

ST.

ZIP CODE

PA

16428

COUNTY

Erie

V INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

Wilcox, John Safety Director

PHONE NO. (area code & no.)

8147259621

VI OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

The Electric Materials Company

B. TYPE OF OWNERSHIP Corporation

(enter the appropriate letter into box)

F - FEDERAL M - NON-FEDERAL

M

VII SIC CODES (4-digit in order of priority)

A. FIRST

(specify) 33 51

C. THIRD

(specify) 33 62

B. SECOND

(specify) 36 29

D. FOURTH

(specify)

VIII TYPE OF HAZARDOUS WASTE ACTIVITY

☒ A. GENERATION

☐

C. STORE

☐

E. TRANSPORTATION

☐

G. REUSE, RECYCLE, RECLAIM

☐ B. TREAT

☐

D. DISPOSE

☐

F. PERMIT BY RULE

☐

H. OTHER (specify):

IX MODE OF TRANSPORTATION (transporters only)

☐ A. AIR

☐ B. RAIL

☐ C. HIGHWAY

☐ D. WATER

☐ E. OTHER (specify):

X EXISTING ENVIRONMENTAL PROGRAM PERMITS

A. NPDES (Discharges to Surface Water)

D. PSD (Air Emissions from Proposed Sources)

Water Quality Management Permit #2571206, Carbon Die Machine Bay House #25-313-00017, Sand Blast Cabinet #25-313-0018

B. UIC (Underground Injection of Fluids)

E. SOLID WASTE

C. RCRA (Hazardous Wastes)

F. OTHER

(specify)

XI TYPE OF NOTIFICATION

Mark "X" in appropriate box to indicate whether this is your installation's first notification of hazardous waste activity, or notification of a change of general information, hazardous waste handled, or hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUCTIONS).

☒ A. FIRST NOTIFICATION

☐

C. DELETION OF A WASTE

☐

E. DELETION OF AN ACTIVITY

☐ B. CHANGE OF GENERAL INFORMATION

☐

D. ADDITION OF A WASTE

☐

F. ADDITION OF AN ACTIVITY

CONTINUE ON REVERSE

XII DESCRIPTION OF HAZARDOUS WASTES (Continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 575.261(h)(2) for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 575.261(h)(3) each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
F 0 0 1					
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 575.261(h)(4) for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 575.261(g)(2) through (5))

☐ 1. IGNITABLE ☐ 2. CORROSIVE ☐ 3. REACTIVE ☐ 4. EP TOXIC.

XIII CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME and OFFICIAL TITLE (Type or Print)

DATE SIGNED

Vice President-General Manager

3/30/83

FOR OFFICIAL USE ONLY

Gen



**ACKNOWLEDGEMENT OF NOTIFICATION
OF REGULATED WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

PAD005028642

INSTALLATION ADDRESS

**THE ELECTRIC MATERIALS CO
50 S WASHINGTON ST
NORTH EAST , PA 16428
JOHN WILCOX MGR**

**50 S WASHINGTON ST
NORTH EAST , PA 16428**



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

PAD 00 502 8642

INSTALLATION ADDRESS

Electric Materials Co.
P.O. Box 390
North East, PA 16428
Attn: John Wilcox, Safety Dir.

50 S. Washington Street
North East, PA 16428